

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CRAIG CUNNINGHAM,)	CASE NO. 1:21-CV-00030-SO
)	
Plaintiff,)	
)	
vs.)	
)	UNOPPOSED MOTION OF
YUSPEH RAPPAPORT LAW LLC,)	DEFENDANTS FOR EXTENSION
RELIABLE LEGAL MARKETING)	OF TIME TO FILE RESPONSIVE
CONSULTING, LLC, AND DOES 1-20,)	PLEADING
)	
Defendants.)	

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Yuspeh Rappaport Law LLC and Defendant Reliable Legal Marketing Consulting, LLC (collectively “Defendants”) hereby request an extension of the time period in which Defendants may respond, by answer or otherwise, to Plaintiff’s Class Action Complaint.

Defendants have been in correspondence with Plaintiff seeking clarification of Plaintiff’s allegations and claims set forth in the Complaint. These communications are currently ongoing. As a result, Defendants request an enlargement of time of thirty days to prepare a responsive pleading to the Complaint. *Creedon v. Taubman*, 8 F.R.D. 268 (N.D. Ohio 1947) (“Extensions always may be asked for, and usually are granted upon a showing of good cause, if timely made, Federal Rules of Civil Procedure, Rule 6(b)(1).”). Plaintiff does not oppose this Motion, and has agreed to the relief requested herein.

Accordingly, Defendants request that, for good cause shown, the Court extend the deadline by thirty days — until August 1, 2021 — in which to file an answer or other responsive pleading in this case.

Date: June 29, 2021

Respectfully submitted,

/s/ Laura E. Kogan

Laura E. Kogan (0087453)

Eric Larson Zalud (0038959)

David M. Krueger (0085072)

**BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP**

200 Public Square, Suite 2300

Cleveland, OH 44114

Telephone: (216) 363-4500

Facsimile: (216) 363-4588

Email: ezalud@beneschlaw.com

Email: lkogan@beneschlaw.com

Email: dkrueger@beneschlaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing UNOPPOSED MOTION OF DEFENDANTS FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING was served upon all interested parties using this Court's ECF filing system this 29th day of June, 2021.

/s/ Laura E. Kogan
Laura Elizabeth Kogan
Attorney for Defendants